

REMARKS

This is in response to the Office Action mailed May 26, 2006. In the Office Action, Applicant's Claims 2-10, 17, 19, 23, 26 and 28 were allowed. Applicant gratefully acknowledges the allowance of these claims.

The Office Action included the following rejections:

- i. independent Claim 24 was rejected as obvious over the combination of U.S. Pat. No. 6,282,489 ("Bellesfield"), U.S. Pat. No. 5,754,846 ("Janse") and U.S. Pat. No. 5,694,534 ("White, Jr.");
- ii. independent Claim 25 was rejected as obvious over the combination of Janse, White, Jr. and Bellesfield;
- iii. dependent Claims 13-15 were rejected as obvious over the combination of Janse, White, Jr., Bellesfield and U.S. Pat. No. 5,968,109 ("Israni"); and
- iv. independent Claim 29 and dependent Claim 20 were rejected as obvious over the combination of Israni and White, Jr.

In the Office Action, the Examiner responded to Applicant's previous response by identifying four remaining issues. With this response, Applicant specifically addresses each of these four issues.

Issue no. 1 – Claim 29

In the Office Action, the Examiner stated that she was unclear regarding the phrase "the data entities contained within each parcel in the data can represent features that are not limited to being located in several subs-areas associated with a parcel" and pointed out that this language is not found in Applicant's Claim 29. The quoted language is taken from page 11 in Applicant's Amendment "E" filed March 9, 2006 where Applicant explained why Claim 29 of the present application is not anticipated by Israni. The Examiner is correct that the quoted language is not found in Applicant's Claim 29. Rather, the quoted language explains a *feature* of the invention described by Applicant's Claim 29 that results from the *structure* described in the claim. Specifically, Applicant's Claim 29 recites that there are two indexes associated with each of the data parcels into

which the computer readable data structures is divided. Specifically, Applicant's Claim 29 recites that each "*first index*" identifies the "*sub-areas*" (e.g., by boundary lines) formed of the area associated with a parcel and the "*second index*" identifies which data records are associated with each of the "*sub-areas*" defined by the "*first index*."

This *structure* recited in Applicant's Claim 29 (i.e., the "*first*" and "*second indexes*" associated with each parcel) distinguishes Israni because Israni discloses having only *one* index associated with a parcel. This single index described by Israni identifies the boundary lines of the cells formed from the area associated with a parcel, as well as the first data record and count of subsequent data records within the parcel associated with each of the cells. In order for the Israni index to identify the first data record and count of subsequent data records associated with each cell, the data records in the parcel are sorted and stored *by cell*, which means that a data record can represent a geographic feature located in only a single cell. This means that geographic features that cross cell boundaries are "broken up" into smaller features, based on the cell boundaries and represented by separate data records associated with each of the separate cells (See, Israni: column 44, lines 9-22; FIG. 11C).

By contrast, the structure described by Applicant's Claim 29 includes "*two indexes*." The "*first index*" identifies the sub-areas (by their boundaries) into which the area associated a parcel is divided. This is similar to the index in Israni. However, the "*second index*" recited in Applicant's Claim 29 is completely different from anything in Israni. The "*second index*" recited in Applicant's Claim 29 identifies each sub-area (one or more) that the geographic feature represented by each data record intersects.¹ By allowing a data record to represent a geographic feature located in more than one sub-area, the *structure* recited in Applicant's Claim 29 provides *features* not found in Israni, i.e., it does not require that the records be stored in order by sub-area (or cell) and further, does not require that geographic features be "broken up" so that they are located in only one sub-area (cell).

¹ The Examiner is referred to the following statement in Israni, at column 44, lines 21-23: "In a present embodiment, the polygon entities do not include information indicating in which cell they are located." This passage from Israni makes it clear that Israni does not disclose the structure or function of the "*second index*" recited in Applicant's Claim 29.

Issue no. 2 – Claim 24

In the Office Action, the Examiner suggested to remove "*such that*" and begin the claim limitation with "*in case said search area interests.*" With this response, Claim 24 has been amended in accordance with the Examiner's recommendation.

Issue no. 3 – Claim 25

In the Office Action, the Examiner suggested to remove "*such that*" and begin the claim limitation with "*in case said search area interests.*" With this response, Claim 25 has been amended in accordance with the Examiner's recommendation.

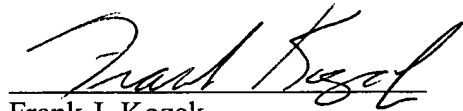
Issue no. 4 – Claims 13-15

In the Office Action, the Examiner disagreed with Applicant's position that dependent Claims 13-15 included additional limitations that are neither disclosed nor suggested by Janse, White, Jr., Bellesfied, and Israni. Since Claims 13-15 depend from independent Claim 25, which is allowable at least for the reasons stated above, additional grounds for patentability exist.

Conclusion

Applicant has addressed the four remaining issues identified by the Examiner. Applicant submits that the present application is in condition for allowance. The Examiner is invited to call the undersigned if any matter remains to be resolved.

Respectfully submitted,



Frank J. Kozak
Reg. No. 32,908
Chief Intellectual Property Counsel

NAVTEQ North America, LLC
222 Merchandise Mart Plaza, Suite 900
Chicago, Illinois 60654
(312) 894-7000 x7371